

# EXHIBIT A

**From:** [Hiller, Jeffrey S.](#)  
**To:** [Ian Hayes](#)  
**Cc:** [Stepp, Brittany L.](#); [Kadela, Dave](#); [Tuzzo, Adam](#); [jessica.cacaccio@nlrb.gov](mailto:jessica.cacaccio@nlrb.gov)  
**Subject:** Subpoena responses - 1:22-cv-00478-JLS - Leslie v. Starbucks Corporation  
**Date:** Monday, October 17, 2022 2:32:56 PM  
**Attachments:** [image001.png](#)  
[image002.png](#)

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Ian,

As you are aware, the Court in the above-referenced matter ordered your clients to produce responsive documents by last Friday, October 14. The Court denied the Union's motion for reconsideration of this order on October 12.

To date, we have not received any documents from Workers United or the individuals subpoenaed, as ordered by the Court. Further, we have not received any correspondence from you regarding the status of such production. Instead of making a good faith attempt to comply, your clients evidently have elected to do nothing. We expect you to cure your clients' failure to comply with the Court's order immediately. This delay has prejudiced our ability to comply with the Court's deadlines for briefing and next month's hearing and has made it impossible for us to assess our defenses and account for the facts revealed by the withheld documents. If we do not receive the responsive documents from you by tomorrow at close of business, then we will seek relief from the Court.

Jeff

**Jeffrey S. Hiller**

Shareholder

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